

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)
)
 v.) No. 1: 19-cr-00142-LM
)
 NATHAN CRAIGUE)

DEFENDANT'S OBJECTIONS TO GOVERNMENT'S PROPOSED REDACTIONS TO
COURT FILINGS AND TRANSCRIPTS

The defendant hereby submits separately, under seal, his objections (Attachment) to the government's proposed redactions to the court filings and transcripts in the above-captioned matter, which the Court has ordered to be submitted pursuant to its Order of November 23, 2021 (ECF #160).

On December 20, 2021, at approximately 2:00pm, the government sent transcripts and court filings with proposed redactions to Craigue's counsel. On December 22, 2021, Craigue's counsel notified the government that its proposed redactions went beyond the scope of the court's order; for example - John Doe's status as a confidential informant and the names of officers involved in the investigations. On December 22, 2021, the government agreed to take another look at its proposed redactions. Later that day, the government made changes to the proposed redactions and provided counsel with a revised copy.

On December 23, 2021, the government, upon re-reading the court's order, agreed with John Doe's counsel that the proposed redactions should include additional transcripts of public testimony. The government sought a one-week continuance to submit a new set of documents with proposed redactions. On Monday, December 27, 2021, the government provided counsel with the revised proposed redactions. As counsel began to review the revisions, it was apparent that the government continued to redact information that counsel believed went beyond the

scope of the court's order – specifically - the names of officers involved in the investigation.

While counsel made a good faith effort to confer and resolve the matter, counsel believed it was more efficient to file a separate response to its proposed redactions. Accordingly, counsel submits separately, under seal, their objections to the government's proposed redactions.

A supporting memorandum of law has not been submitted because it is unnecessary in light of the nature of the relief requested.

Dated: January 5, 2022

Respectfully submitted,

By: /s/ Dorothy E. Graham

Dorothy E. Graham
Assistant Federal Defender
22 Bridge Street
Concord, NH 03301
Dorothy_graham@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2022, the above document was served upon all counsel of record through email.

/s/ Dorothy E. Graham
Dorothy E. Graham